

SECAS Guidance Notes: End-to-End Process

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1. What is the SEC Modification Process?

The Smart Energy Code (SEC) is a binding document that Parties sign up to. The SEC Modification Process is the official mechanism that allows Parties to make changes to the SEC arrangements in response to any issues or defects they identify.

Changes that are raised are referred to as [modifications](#). Depending on where they are in the process they can be referred to as 'Draft Proposals' or 'Modification Proposals'. The conversion of a Draft Proposal to a Modification Proposal will be discussed in the 'Development Stage' section of this document.

2. Raising a Draft Proposal

Any SEC Party can submit a Draft Proposal via the Smart Energy Code Administrator and Secretariat (SECAS) website using the following [link](#).

For further guidance on raising Draft Proposals and what your role as the Proposer entails, please refer to the 'How to Raise Change' document available on our [website](#).

3. Types of Modification

There are four main types of modification, and variations in how these different types are progressed. We will work with you to agree a preferred modification type for your proposal,

and this will then be assessed and either approved or rejected by the [Change Sub-Committee](#) (CSC).

Authority-initiated Modifications

This is when the Draft Proposal is submitted either by the Authority or by the Data Communications Company (DCC) acting at the direction of the Authority, for example when changes have arisen from a Significant Code Review (SCR).

Authority Determined Modifications

Authority Determined Modifications require Authority approval before they can be implemented. This applies to modifications which are deemed likely to impact one or more of the following areas:

- existing or future energy consumers;
- competition in the Supply of Energy or associated Commercial Activities;
- the environment;
- Data access / privacy;
- security of the Supply of Energy and related Systems;
- the Modification Process and its governance; or
- discrimination between Parties.

Fast-Track Modifications

These are modifications for correcting minor inaccuracies or inconsistencies in the SEC, such as typographical errors, that do not constitute material changes.

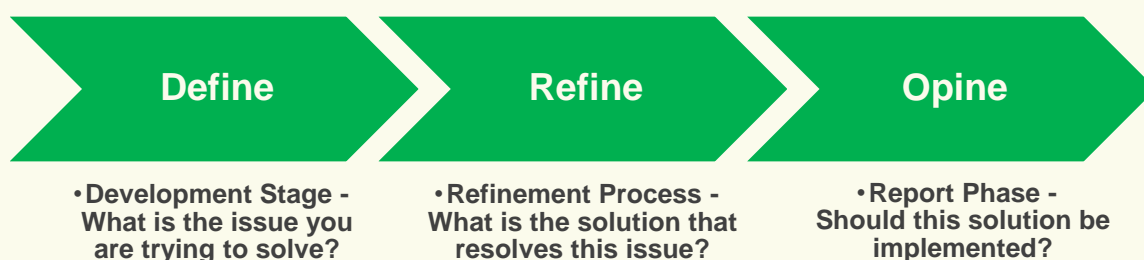
Self-Governance Modifications

This is the most common type and is any modification which doesn't fit into any of the above criteria. 'Self-Governance' means that the [Change Board](#) vote by industry is the final decision on implementation¹.

¹ Following the Change Board's decision there is a ten Working Day referral window during which Parties can object to the implementation of the modification. More information can be found under the heading 'Report Phase - Opine'

4. Modification Process

The Modification Process is split into three core stages, with each focused on a specific question:



5. Development Stage - Define

Once the Draft Proposal has been raised, the modification has entered the Development Stage. A Lead Analyst will be assigned to the modification who will be your main point of contact within SECAS.

In their role as ‘critical friend’, the Lead Analyst will challenge the proposal as much as possible in the Development Stage to ensure the modification has the best chance of being successful. They will also provide honest feedback on any obstacles which they anticipate may impede the progression of the modification, such as high costs or limited appeal to SEC Parties.

The purpose of the Development Stage is to ensure the issue and its impacts are fully defined and understood, to confirm that a SEC Modification is the appropriate route to a solution, and to identify the relevant parts of the SEC that are impacted. The Lead Analyst will achieve this by working with the Proposer, the DCC, SECAS’s internal technical and other Subject Matter Expert (SME) support, Sub-Committees, and other interested Parties. Once the Lead Analyst believes these criteria are met, they will present the updated Modification Report to the CSC for conversion from a Draft Proposal into a Modification Proposal and progression into the Refinement Process, or in some cases, directly to the Report Phase.

The CSC can prevent a modification from being progressed to the Refinement Process if it believes the criteria haven’t been met, however it cannot reject the modification outright. If you as the Proposer are unable to attend the CSC meeting, we will advise you of the decision and help to decide how to proceed.

6. Refinement Process - Refine

The purpose of the Refinement Process is to develop the best solution possible to the issue identified in the Draft Proposal.

If the Lead Analyst, the Proposer, the CSC and the DCC agree that there is a clear and straightforward solution which does not have a significant impact on SEC Parties, it may be possible to proceed directly to the Report Phase and thereby avoid passing through the Refinement Process.

However, most modifications will require input on the solution from other industry Parties, especially where they are impacted. We will work with you, the DCC, and SECAS's internal technical and SME support to create a 'strawman' solution which will then be developed with the Working Group.

The Refinement Process will differ for each modification depending on which areas of the SEC are impacted by the issue being addressed. Different Sub-Committees will be asked to provide feedback on the modification as it relates to their areas of responsibility, and the DCC will need to complete assessments of the solution if it impacts DCC Systems.

However, the Refinement Process will always include a Refinement Consultation. This is a set of questions that we issue to industry Parties, inviting feedback on the modification and the issue being addressed. We will always share the responses, omitting any confidential information, and address any concerns raised during the solution development.

Working Group

The Working Group is comprised of the Lead Analyst, the Proposer, representatives from SECAS, the DCC and other industry Parties. Its purpose is to provide independent expert input for developing and assessing potential solutions to the identified issue, to provide feedback on the scale of the issue and costs of the solution and express views on the suitability of the proposed modification progression pathway.

For further guidance on the role of the Working Group, please refer to the 'Working Group Guidance' document available on our [website](#).

Sub-Committee meetings

We will engage with the relevant Sub-Committees for input on the issue, impacts and Proposed Solution. Some Sub-Committees may request to receive further updates on the progression of a modification to ensure they support the solution as it develops, or to identify any issues or concerns.

DCC Assessments

If the Proposed Solution is expected to have an impact on DCC Systems, the DCC is required to carry out its own assessments and provide the results to SECAS. These are conducted in two stages. A Preliminary Assessment is completed once the Working Group has agreed a strawman solution and the business requirements to implement it. The Preliminary Assessment gives approximate delivery costs and timescales to implement the solution. Following action on any feedback from the Preliminary Assessment and the Refinement Consultation, we will request a full Impact Assessment for final costs, solution methodology, and impacts. The Preliminary Assessment will state the financial cost for completing the full Impact Assessment.

Legal text

A modification's legal text is the amended wording of the SEC required to deliver the Proposed Solution. The changes are drafted by the Lead Analyst with input from technical support within SECAS, reviewed internally and by the SEC Lawyer, and agreed by the Proposer and the Working Group.

7. Report Phase - Opine

Once the CSC has agreed that the proposal has been fully analysed and assessed, and that the Modification Report fully and accurately documents the process, the modification enters the Report Phase. We will immediately send a Modification Report Consultation to industry Parties, inviting comments on whether the modification should be implemented and requesting any final feedback. The Modification Report is then presented to the Change Board, which will vote on whether to approve or reject the modification.

If the modification is a Self-Governance Modification the Change Board vote is the final decision. If the modification is Authority Determined, the Change Board vote acts as a recommendation, which is passed to the Authority who then make the final decision.

In Self-Governance Modifications, there is a 10 Working Day referral window following the Change Board's approval. During this period, any SEC Party can contact us to object to the Change Board's decision. The modification will then be returned to the CSC to discuss the objection and decide what needs to be done to address this before proceeding. If no objections are received, the Change Board decision is final and we move to implementation.

8. Implementation

Multiple approved Modification Proposals are grouped together into '[SEC Releases](#)' for implementation. This saves cost and effort for industry and provides greater certainty for Parties around when changes are due to occur.

SEC Releases

There are three scheduled SEC Releases each calendar year in February, June and November. The February SEC Release is a 'SEC Documentation Release'; this only consists of modifications which impact the SEC documentation but not the DCC Systems. Modifications which impact the DCC Systems are included in the June and November SEC Releases, which are referred to as 'SEC System Releases'. The SEC System Releases may also include modifications which only impact SEC documentation.

For further information on SEC Releases please refer to the SEC Release Guidance document available on our [website](#).

Ad-hoc releases

An ad-hoc release may implement modifications that could be included in either a SEC Documentation Release or a SEC Systems Release. An ad-hoc release may be necessary where it is not appropriate to align the implementation of a modification with a scheduled SEC Release, for instance where the solution is required to mitigate a time-sensitive issue.

9. Withdrawals

You are free to withdraw your modification at any point in the process by emailing your Lead Analyst. We will then advise SEC Parties of this decision, from which point any SEC Party has ten Working Days to express a wish to adopt the modification. If no such request is received, the modification will be closed and any Party wishing to address the identified issue will need to submit a new Draft Proposal.